

DAIKIN



DAIKIN AMERICA, INC.

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October 31, 2015

Ms. Wendy Cleland-Hamnett
Director
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 7401M
Washington, DC 20460

Contains Confidential Business Information

Re: 2014 Information for PFOA Stewardship Program

Dear Ms. Cleland-Hamnett:

In March 2006, Daikin America Inc. (DAI) joined other members of the fluorochemical industry in agreeing to participate in the 2010/15 PFOA Stewardship Program sponsored by the U.S. Environmental Protection Agency (EPA). With the report attached, our eighth in this program, DAI is honoring the commitment we made at that time to provide annual reports about the levels of PFOA, precursors and higher homologue substances in our products and in our facility releases to the environment. This information is consistent with the baseline information that we filed in 2006 and the annual updates that we filed for each year from 2007 through 2014.

As we have noted in previous communications:

DAI's commitment to the Stewardship Program is part of a long-range company effort, which has been ongoing for over a decade, to reduce the amount of PFOA in our products and in our facility releases. In 2011 we certified to EPA that

our company had met the 2010 goal for the 2010/15 PFOA Stewardship Program by reducing the aggregate amounts of the PFOA Stewardship Program substances in environmental releases from our facilities and in our products by over 95% since the baseline year of 2000, both in the United States and in the rest of the world.

By switching our production of plastics to non-PFOA alternative emulsifiers, we have completely eliminated PFOA from our polymerization processes and polymerized product in the United States and globally.

By converting our telomer products from C8 to C6 products we have reached the ultimate goals of virtual elimination of PFOA for the production and product content of our telomer products.

We are providing two documents in this submission.

First, we are providing a public report that is based on Appendix E of the guidance document that EPA circulated to Stewardship Program participants on October 11, 2006 and is consistent with the public summary that EPA published on the EPA web page last year. This is a public document, and we anticipate that EPA will be posting this document on its Website for the Stewardship Program.

This document is formatted to make the document consistent with our understanding of the submissions filed by other companies, as summarized in the EPA publication. We have modified the wording in some of the columns to be more closely descriptive of the situation.

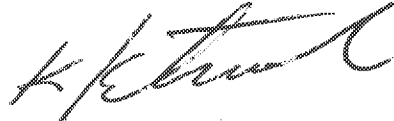
Second, we are providing a background document for EPA that explains the data sources for the information provided. We have, in previous report, explained the methodologies by which DAI is making physical measurements, and by which we are converting the raw data into reportable information. These methodologies remained the same in this past year.

As in the past, this background document must remain confidential because it contains proprietary business information. EPA should, however, feel free to post the public report on the Agency's Website.

Although we note that our next report will be the final one of this program, Daikin remains committed and fully engaged in working toward the letter and spirit of the Stewardship Program.

Please let us know if you have any questions about the specific data, methodologies or calculations that underlie our public report. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "K. E. Turner". The signature is fluid and cursive, with a large, stylized "K" and "T".

President & CEO
Daikin America, Inc.

Daikin Public Report
PFOA Stewardship Program

Table 1 -- Reported Emissions and Product Content of PFOA, Precursors, and Higher Homologues from U.S. Operations (2014 reporting year; submitted in 2015)

Company	Chemical Category	Releases to all media from FP and Telomer Manufacturing (kg)	Releases to all media from FP and Telomer Manufacturing (kg/kg)	Product Content in Dispersions (ppm wet-weight basis)	Product Content in other Fluoropolymers (ppm dry-weight basis)	Product Content in Telomers (ppm dry-weight basis, unless stated otherwise)
Daikin	PFOA	0	0	0	0	0
	Precursors and Higher Homologues	0	0	Not Applicable	Not Applicable	0

Table 2 -- Reported Percent Reductions in Emissions and Product Content of PFOA, Precursors, and Higher Homologues from U. S. Operations (2014 reporting year; submitted in 2015)

Company	Chemical Category	% Reduction in Emissions	% Reduction in Product Content		
		% Reductions in releases from baseline year	Dispersions (ppm wet-weight basis)	Other Fluoropolymers (ppm dry-weight basis)	Telomers (ppm dry-weight basis, unless stated otherwise)
Daikin	PFOA	100%	100%	100%	100%
	Precursors and Higher Homologues	100%	Not Applicable	Not Applicable	100%

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◆ *Environmental Releases of PFOA from Fluoropolymer Production*

		in 2000 and 2014			
Operations		(Total PFOA Used)	(Production volume of Fluoropolymer Products Manufactured using PFOA)	Releases to all environmental compartments from F-polymer manufacture	
				(PFOA)	kgs of PFOA tons of F-polymers
U.S.	2000	(kgs)	(tons/year)	(kgs)	
	2014				

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◆ *Environmental Releases of PFOA, Precursors and Higher homologues from Telomer Production*

in 2000 and 2014				
Operations	(Production volume of Telomer Products)	Releases to all environmental compartments from F-telomer manufacture	Type of moiety	kgs of moiety tous of telomers
U.S.	2000	(tons/year)	PFOA	
			Precursors and Higher homologues	
	2014		PFOA	
			Precursors and Higher homologues	

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◆ Concentration of PFOA in Fluoropolymer Products **TSCA CBI - Sanitized**

in 2000 and 2014			
Operations		(Sales volume of Fluoropolymer Products Manufactured using PFOA) (tons/year)	Concentration of PFOA in Products
			(PFOA) kgs of PFOA tons of F-polymers
U.S.	2000	Dispersion	
		Others	
	2014	Dispersion	
		Others	

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◆ *Concentration of PFOA, Precursors & Higher homologues in Telomer Products (PFOA, Alcohol, Olefin, Iodide)*

in 2000 and 2014				
Operations	(Sales volume of Telomer Products)	Concentration of Moiety in Products		
		Type of moiety	(kgs)	<u>kgs of moiety</u> tons of telomers
U.S.	2000	PFOA		
		Precursors and Higher homologues		
	2014	PFOA		
		Precursors and Higher homologues		

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